

Stacy B. Loftin
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ATTORNEYS FOR FROST BANK

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**SiO2 Fabricating, LLC
dba Legacy Glass**

Debtor.

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CASE NO. 24-40215-elm7

CHAPTER 7

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

COMES NOW ADAMS, LYNCH &, LOFTIN, P.C., by and through the undersigned, and files this Notice of Appearance and Request for Notice ("Notice of Appearance"), and hereby appears in the above-captioned case under Title 11 of the United States Code ("Bankruptcy Code") on behalf of Frost Bank, a creditor and party-in-interest, and pursuant to Bankruptcy Rules 2002, 9007 and 9010 and Section 1109(b) of the Bankruptcy Code, hereby requests that all notices given or required to be given to, and all papers to be served or required to be served in the above-captioned case and any other case(s) consolidated herewith, be given to and served upon:

Mr. Stacy B. Loftin
Adams, Lynch & Loftin, P.C.
3950 Highway 360
Grapevine, TX 76051
Telephone: (817) 552-7742
Facsimile: (817) 328-2942
sbl@all-lawfirm.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, notice, application, proposed order, complaint, demand, hearing, motion, petition, pleading, plan of reorganization, disclosure statement or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed, which may effect or seek to effect any rights or interest of the Debtor, the aforementioned parties-in-interest or any property or proceeds in which the Debtor may claim an interest. Please add the attorney of record to such mailing matrix as may be used for all purposes in this case.

PLEASE TAKE FURTHER NOTICE that, neither this Notice of Appearance, nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct is intended to be, nor shall it constitute, a waiver of the aforementioned parties-in-interest's: (1) right to have final orders in non-core matters entered only after de novo review by a District Court Judge; (2) right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004; (3) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial rights pursuant to statute or the United States Constitution; (4) right to

have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (5) other rights, claims, actions, defenses, setoffs or recoupments to which such parties-in-interest are or may be entitled under agreements, in law, in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by such parties-in-interest without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

DATED this 25th day of January 2024.

Respectfully submitted,

ADAMS, LYNCH & LOFTIN, P.C.
3950 Highway 360
Grapevine, Texas 76051
Telephone: (817) 552-7742
Facsimile: (817) 328-2942

By:



STACY B. LOFTIN
State Bar No. 12489500
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RICHARD E. HILL
State Bar No. 09651300
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ATTORNEY FOR FROST BANK

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2024 a true and correct copy of the above and foregoing Notice of Appearance and Request for Notices has been served electronically to all parties who have filed a request for notice or service as of January 25, 2024 or mailed to the parties who are listed below.


STACY B. LOFTIN

Trustee:

Shawn K. Brown
Chapter 7 Trustee
PO Box 93749
Southlake, TX 76092

U.S. Trustee:

United States Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75202

Debtor's Attorney:

Warren V. Norred
Norred Law PLLC
515 E. Border Street
Arlington, TX 76010